

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

Criminal No.:

3:20-521

v.

18 U.S.C. § 844(f)

18 U.S.C. § 2

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 981(a)(1)(G)

18 U.S.C. § 844(c)(1)

28 U.S.C. § 2461(c)

MARCELLO EARLE WOODS

SEALED INDICTMENT

COUNT 1

(Damage and Destruction by Fire of a Vehicle Owned & Possessed by Institution Receiving
Federal Financial Assistance and Aiding & Abetting)

THE GRAND JURY CHARGES:

On or about May 31, 2020, in the District of South Carolina, the Defendant, **MARCELLO EARLE WOODS**, knowingly and maliciously did damage, destroy, attempt to damage, and attempt to destroy by means of fire a vehicle, to wit, a Columbia Police Department vehicle bearing South Carolina license plate number MG60107, which was then owned by, possessed by, and leased to the City of Columbia and the Columbia Police Department, an institution receiving federal financial assistance, and did aid and abet others known and unknown to the Grand Jury in the commission of the aforementioned offense;

In violation of Title 18, United States Code, Sections 844(f) and 2.

FORFEITURE

A. **EXPLOSIVE MATERIALS:**

Upon conviction for violation of Title 18, United States Code, Section 844 as charged in this Indictment, the Defendant, **MARCELLO EARLE WOODS**, shall forfeit to the United States any property, real or personal, involved in the offense, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense.

B. **PROPERTY:**

Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and (G), 18 U.S.C. § 844(c)(1) and 28 U.S.C. § 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

Cash Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained directly or indirectly from the offense charged in the Indictment, and all interest and proceeds traceable thereto, and/or a sum of money equal to all property involved in the arson offense charged in the Indictment, and all interest and proceeds traceable thereto.

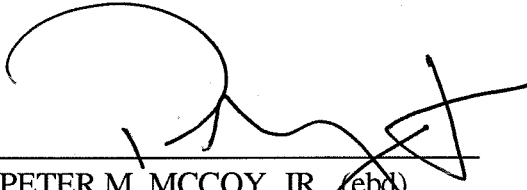
C. **SUBSTITUTE ASSETS:**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the said Defendant up to the value of the above described forfeitable property;

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 981(a)(1)(G), and 844(c)(1) and Title 28, United States Code, Section 2461(c).



PETER M. MCCOY, JR. (ebd)
UNITED STATES ATTORNEY

A TRUE Bill


FOREPERSON